

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

Christopher L Gatling, Sr
Dawn Michele Gatling
Debtors

Chapter 13

1:19-bk-00510-HWV

Americredit Financial Services

vs.

Christopher Gatling, Sr.
Dawn Michele Gatling

vs.

Charles Dehart, III, Trustee

ANSWER TO MOTION FOR RELIEF FROM STAY

AND NOW, this 2nd day of November, 2020, the Debtors file this Answer and state the following:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Denied. By way of further answer, Debtors have a confirmed plan but were in the process of amending their plan to surrender their house, and were paying a reduced amount based on the new calculations prior to the plan actually being amended. No motion to dismiss for material default was filed by the Trustee. Debtors' plan has since been amended and the small amount of arrears were rolled into their amended plan. Furthermore, due to back taxes

that were owed by Debtors, which are paid in the Plan as priority debts before secured creditors, no payments have even been made to Movant yet.

Respectfully Submitted:
/s/ Dawn M. Cutaia
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